

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI

JEREMIAH PARKER, et al.,	)	
	)	
Plaintiffs,	)	Case No. 4:22-cv-454
	)	
v.	)	
	)	
KEARNEY SCHOOL DISTRICT, et al.,	)	
	)	
Defendants.	)	

**MOTION FOR LEAVE TO AMEND**

COME NOW, Plaintiffs, and hereby move pursuant to Fed. R. Civ. P. 15 (a)(2) for leave to amend their Complaint to include additional facts, newly discovered facts, and a Section 1983 claim asserting Section 1981 liability. Good cause exists to grant Plaintiffs' motion because the case is still in the early stages, no discovery has been conducted, no deadlines have been set and some of the facts arise from newly discovered evidence.

Plaintiffs' proposed First Amended Complaint is attached as Exhibit 1.

Plaintiffs furthermore incorporate their Suggestions in Support.

Plaintiffs pray that the relief requested through this Motion be granted, specifically that this Court grant Plaintiffs leave to file their First Amended Complaint pursuant to Rule 15(a)(2).

Respectfully submitted,

BROWN & CURRY, L.L.C.

/s/ Dan Curry

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**ATTORNEYS FOR PLAINTIFF**

**Certificate of Service**

I certify that this document was filed with the Court's electronic filing system, providing service to the parties on November 28, 2022.

/s/ Dan Curry

Attorney for Plaintiffs